

Deficiency Progress Report - Update 1

Received June 16, 2009

To complete the evaluation process, Cal/EPA requires the CUPAs to submit Deficiency Progress Reports that explain the CUPA's progress towards correcting the identified deficiencies. Deficiency Progress Reports are due every 90 days after the evaluation date until all deficiencies have been corrected.

CUPA Name: Glendale Fire Department

Evaluation Date: March 18 and 19, 2009

Evaluation Team:

Cal/EPA: Mary Wren-Wilson and John Paine

SWRCB: Sean Farrow

Cal/EMA: Fred Mehr

Deficiencies corrected to date: N/A

Deficiencies corrected with update 1: 1, 3, 6 and 7

Deficiencies in progress: 2, 4 and 5

Deficiency 1: The CUPA's consolidated facility permit is missing a required data element. The CUPA's consolidated permit does not include the "date issued."

CUPA Corrective Action: An "Issue Date has been added to the permit. See attachment 1.

CalEPA Response (Update 1): CalEPA considers this deficiency corrected.

Deficiency 2: The CUPA has incorrectly reported enforcement actions they completed during the passed three reporting years.

CUPA Corrective Action: The Glendale CUPA will insure that enforcement actions are properly reported in the upcoming September 2009 reports.

CalEPA Response (Update 1): Please submit copies of reports 2, 3, and 4 for fiscal year 08/09 with Progress Report Update 2, due September 15, 2009.

Deficiency 3: The CUPA has not annually reviewed, updated and made necessary amendments to their Unified Inspection and Enforcement Plan.

CUPA Corrective Action: The Enforcement Plan has been updated and additional policy has been created by adding the “Red-Tag” enforcement option for UST sites. See Attachment 2 (pages 14-15).

CalEPA and SWRCB Response (Update 1): CalEPA and SWRCB consider this deficiency corrected.

Deficiency 4: The CUPA is not ensuring that regulated businesses submit certifications at least once every three years, that they have reviewed their Business Plan, and made necessary changes. Nearly half of the facility files reviewed were either missing the plan or contained outdated plans.

CUPA Corrective Action: Recently we updated all of our Inventory Disclosure and Business Plan. Presently they are in process of being duplicated for mass mailing. Each Business will be given 30 days to complete and mail the package back to our office. Attachments 3A, 3B, and 3C are samples of these revised forms.

CalEMA Response (Update 1): Cal EMA is satisfied with the CUPA's efforts in correcting the deficiency. Cal EMA looks forward to following the CUPA's continued efforts to correct this deficiency.

Deficiency 5: The CUPA's facility files are not indexed by street address and company name. During file review, 70% of the files were indexed by street address only.

CUPA Corrective Action: The work has begun to change the labels. The target date for compliance is September 2009.

CalEMA Response (Update 1): Cal EMA is satisfied with the CUPA's efforts in correcting the deficiency and for completing over one third of Cal ARP Audit Inspections. Cal EMA looks forward to following the CUPA's continued efforts to correct this deficiency.

Deficiency 6: The CUPA has not met the mandated inspection frequency for underground storage tank (UST) facility during the last three fiscal years.

CUPA Corrective Action: As you are aware, at the time of evaluation, the Glendale CUPA was in compliance with the annual inspection frequency for FY 2008-09. The Glendale CUPA intends to keep this trend throughout the FY 2009-10 by tracking the monthly progress.

SWRCB Response (Update 1): The SWRCB considers this deficiency corrected.

Deficiency 7: The CUPA is not approving submitted UST monitoring plan forms (Unified Program Consolidated Form (UPCF UST-D)). The files reviewed indicate that the CUPA is not signing the approval/disapproval box on page four, indicating that the form has been reviewed for completeness and accuracy.

CUPA Corrective Action: The Glendale CUPA reviewed and revised the Unified Program Consolidated Permit Procedures (attachment 4, page 5, last paragraph) to include UST annual permit pre-issue process that includes review and approval of UST Monitoring Plans.

SWRCB Response (Update 1): The SWRCB considers this deficiency corrected.